

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FEB 13 2019

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALLISTER DANZIG QUINTANA,

Defendant.

CRIMINAL NO. 18-CR-03989-WJ

Count 1: 18 U.S.C. §§ 1153 and 1111:
First Degree Murder;Count 2: 18 U.S.C. §§ 1153 and 1201(a):
Kidnapping Resulting in Death;Count 3: 18 U.S.C. §§ 1153 and 1201(c):
Conspiracy to Commit Kidnapping.SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

On or about February 3, 2018, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **ALLISTER DANZIG QUINTANA**, an Indian, unlawfully killed John Doe with malice aforethought, in that the defendant killed John Doe willfully, deliberately, maliciously, and with premeditation, by beating John Doe with his fists, a flashlight, and a stick, and stabbing John Doe with a machete and a sword.

In violation of 18 U.S.C. §§ 1153 and 1111.

Count 2

From on or about February 2, 2018, and continuing to on or about February 3, 2018, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **ALLISTER DANZIG QUINTANA**, an Indian, did unlawfully and knowingly kidnap, abduct, seize, confine and carry away John Doe, for some purpose or benefit, resulting in the death of any person.

In violation of 18 U.S.C. §§ 1153 and 1201(a).

Count 3

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, in Indian Country, in Rio Arriba County, in the District of New Mexico, and elsewhere, the defendant, **ALLISTER DANZIG QUINTANA**, an Indian, and others known and unknown, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other to kidnap, abduct, inveigle, decoy, seize, confine, and carry away John Doe for some purpose and benefit, and, John Doe's death resulted.

Overt Acts

In furtherance of the conspiracy, and to effect the object thereof, the following overt acts, among others, were committed in Indian Country, in the District of New Mexico:

Overt Act 1

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** requested others known and unknown to physically assault John Doe.

Overt Act 2

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** and others known and unknown physically assaulted John Doe by striking him with their fists.

Overt Act 3

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** requested others known and unknown to bring him a flashlight and machete to assault John Doe.

Overt Act 4

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** assaulted John Doe with a flashlight, sword, stick, and machete.

Overt Act 5

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** requested others known and unknown to bring him electrical cord to bind and confine John Doe.

Overt Act 6

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** bound and confined John Doe with electrical cord.

Overt Act 7

Between on or about February 2, 2018, and continuing to on or about February 3, 2018, **ALLISTER DANZIG QUINTANA** and others known and unknown carried John Doe from a bathroom to a closet.

In violation of 18 U.S.C. §§ 1153 and 1201(c).

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

M — P —
Assistant United States Attorney

KV 2/11/19 10:10 am